

October 25, 2022

Via ECF

Hon. Lee G. Dunst
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Goldblatt v. New York Institute of Technology, EDNY 18cv00265 (DRH)(LGD)

Your Honor:

I write this letter on behalf of both parties and pursuant to the Court's Order of October 18, 2022 that a status letter be provided. Firstly, let me apologize for not appearing at the Court's last scheduled conference of October 18, 2022. Due to unforeseen circumstances I have been out of the office for some time. Nonetheless, I endeavored to ensure all appearances were calendared and covered, and regrettably did not have the above-referenced conference properly scheduled. Opposing counsel apprised me of what was discussed and we have worked at scheduling the remaining anticipated deposition in connection with fact discovery. Opposing counsel and I have now scheduled the deposition of defendant's representative on November 17, 2022 at 10:00 am., which is the first date of availability for the witness as well as both counsel. Based on current conversations, the parties do not believe additional depositions will be held, however we respectfully request and reserve the right to seek additional discovery pending the testimony provided on the 17th. The matter is currently scheduled for conference on November 8, 2022.

I thank you for your attention to this matter and request that the Court approve the requested extension and proposed briefing schedule.

Respectfully Submitted,

Gregory A. Tsonis
Gregory A. Tsonis (GT-5737)